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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

JUNHAN JEONG, individually and on behalf
 of all others similarly situated,

Plaintiff,

vs.

NEXO CAPITAL INC.

Defendant.

Case Number: 5:21-CV-02392-BLF

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER**

AS MODIFIED BY THE COURT

1 Plaintiff Junhun Jeong, individually and on behalf of all others similarly situated, and De-
 2 fendant Nexo Capital Inc. (“Nexo”), by and through their undersigned counsel, hereby stipulate
 3 as follows:

4 WHEREAS, on September 10, 2021, the Court so-ordered the parties’ stipulated schedule
 5 regarding discovery (the “Initial Schedule”) (*see* Dkt. No. 40);

6 WHEREAS, deadlines set forth in the Initial Schedule were tied to the Court’s adjudica-
 7 tion of Nexo and its corporate affiliates’ motion to dismiss, which was filed on July 19, 2021
 8 (*see* Dkt. No. 27), and decided on January 19, 2022 (*see* Dkt. No. 48);

9 WHEREAS, after the Court granted in part and denied in part Nexo and its affiliates’ mo-
 10 tion to dismiss, Plaintiff filed an amended complaint against Nexo (*see* Dkt. No. 55);

11 WHEREAS, on March 28, 2022, Nexo filed a motion to dismiss Plaintiff’s amended
 12 complaint (*see* Dkt. No. 56);

13 WHEREAS, Nexo’s motion to dismiss Plaintiff’s amended complaint will be fully
 14 briefed by June 13, 2022 (*see* Dkt. No. 54);

15 WHEREAS, the hearing on Nexo’s motion to dismiss Plaintiff’s amended complaint is
 16 currently set for July 21, 2022 at 9:00 a.m.;

17 IT IS ACCORDINGLY HEREBY STIPULATED AND AGREED, by and between the
 18 undersigned counsel for Plaintiff and Nexo, subject to the Court’s approval, as follows:

- 19 1. The Initial Schedule (Dkt. No. 40) is vacated. *
- 20 2. The parties will submit a stipulated revised schedule to the Court within fourteen
 21 days of the Court’s order on Nexo’s motion to dismiss Plaintiff’s amended complaint.

22
 23 ***All pretrial and trial dates previously set by the Court remain set, including Last Day to**
 24 **Hear Dispositive Motions, Final Pretrial Conference, and trial dates. See ECF No. 32.**

1 DATED: May 24, 2022

EVERSHEDS SUTHERLAND (US) LLP

2 By: /s/ Ian Shelton

3 Ian Shelton

4 *Attorneys for Defendant*

5
6 DATED: May 24, 2022

ROCHE FREEDMAN LLP

7 By: /s/ Edward Normand

8 Edward Normand

9 *Attorneys for Plaintiff*

10
11 **NDCA LR 5-1(h)(3) Declaration**

12 I attest that Ian Shelton concurs in the filing of this document.

13
14 DATED: May 24, 2022

ROCHE FREEDMAN LLP

15 By: /s/ Edward Normand

16 Edward Normand

17 *Attorneys for Plaintiff*

18
19
20 PURSUANT TO STIPULATION, IT IS SO ORDERED:

21
22 DATED: May 25, 2022



23 HON. BETH LABSON FREEMAN